

EPA FACILITY INSPECTION REVIEW			
Triangle Oil, LLC			
John Day, Oregon 97845			
SPCC RULE REFERENCE	PLAN	FIELD	INSPECTION DEFICIENCY DESCRIPTION (5/26/2015)
112.3(a) SPCC Plan Preparation	X	NA	For facilities (except farms), including mobile or portable facilities: <ul style="list-style-type: none"> In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by November 10, 2011 <i>“PLAN DEFICIENCY - The facility, which was in operation prior to August 16, 2002, has not revised its existing SPCC plan in accordance with the requirements of the revised SPCC rules. The facility must have done so no later than November 10, 2011.”</i>
112.3(d) Professional Engineer (PE) Certification	X	NA	Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: <ul style="list-style-type: none"> Procedures for required inspections and testing have been established Plan is adequate for the facility
112.5(a) SPCC Plan Amendment	X	NA	Plan amended within six months of any change at the facility that materially affects the potential for a discharge described in §112.1(b). <i>“PLAN DEFICIENCY - The facility has not amended the SPCC plan to reflect changes at the facility, including change in ownership, change in the person accountable for preventing oil discharges, change in type of oil stored in the package oil warehouse, and replacement (and change of volume) of one "tank farm" bulk storage container. The plan must be amended within 6 months of changes that materially affect the potential for a discharge.”</i>
112.5(b) SPCC Plan Review	X	NA	Review and evaluation of the Plan completed at least once every 5 years. <i>“PLAN DEFICIENCY - The facility has not conducted 5 year plan reviews which were due in February of 2005, 2010, and 2015.”</i>
112.7 General SPCC Requirements	X	NA	Management approval at a level of authority to commit the necessary resources to fully implement the Plan. Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions. <i>“PLAN DEFICIENCY - The "Management Approval" section of the SPCC plan was not signed by the former owner, current owner, or facility manager.”</i>
112.7(a) Facility Description (3)	X		Plan describes physical layout of facility and includes a diagram that identifies: <ul style="list-style-type: none"> Location and contents of all regulated fixed oil storage containers Storage areas where mobile or portable containers are located Completely buried tanks otherwise exempt from the SPCC requirements (marked as “exempt”) Transfer stations Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11) <i>“PLAN DEFICIENCY - The SPCC Plan diagram does not indicate the location of each fixed oil container (specifically, the office heating oil tank); the contents of each fixed oil storage container; and does not indicate the location where portable containers (e.g. drums) are stored (e.g. warehouse). The diagram also does not depict connecting oil transfer pipes.”</i>
Facility Description cont'd (3)(i)&(vi)	X		Plan addresses each of the following: <p>(i) For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities</p> <i>“PLAN DEFICIENCY - The types of oils and containers listed in the</i>

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			<p><i>facility SPCC plan do not match what is actually present at the facility. The plan states that there is a 5,995 gallon container (ID 2987) of off-road diesel fuel, however, this container has been removed and replaced with an approximately 10,000 gallon container of off-road diesel fuel. Additionally, the plan also states that a maximum of 50 drums containing grease and lubrication oil will be kept in the warehouse; the plan does not list drums of racing fuel which were observed in the warehouse during the field inspection. Finally, one heating oil tank is installed at the facility office - this container should be identified in the plan and managed properly.</i></p> <p>FIELD DEFICIENCY - Empty container storage area. The 2 containers that were formerly used to store (heating) oil do not meet the requirements of the definition of "Permanently Closed" in 40 CFR 112.2. Therefore, these containers should be described in the plan and managed as active oil storage containers, or they should meet the "Permanently Closed" requirements."</p> <p>(vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)</p> <p>"PLAN DEFICIENCY - The spill response contractor listed in the SPCC plan appears to have a suspended license (OR CCB 156804) for lacking proof of insurance; additionally, the contractor's phone number has been disconnected. This spill response contractor may no longer be in business. This part of the plan must be updated with current spill response contractor contact information, assuming the facility still intends to rely on an outside contractor."</p>
112.7(a) Reporting a Discharge (4)	X	NA	<p>Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the:</p> <ul style="list-style-type: none"> • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and <p>Names of individuals and/or organizations who have also been contacted.</p>
112.7(a) Plan Organization (5)	X	NA	Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency.
112.7(b) Discharge Flow Prediction	X	NA	<p>Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure.</p> <p>"PLAN DEFICIENCY - The SPCC plan does not include oil discharge predictions."</p>
112.7(c) Appropriate Secondary Containment	X	X	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), except as provided in §112.7(k) of this section for certain qualified operational equipment. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method,

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			<p>design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. For onshore facilities, one of the following or its equivalent is required for Bulk storage containers; Mobile/portable containers; Piping and related appurtenances; and Transfer areas, equipment and activities:</p> <ul style="list-style-type: none"> • Dikes, berms, or retaining walls sufficiently impervious to contain oil; • Curbing or drip pans; • Sumps and collection systems; • Culverting, gutters or other drainage systems; • Weirs, booms or other barriers; • Spill diversion pond; • Retention ponds; or • Sorbent materials. <p><i>"FIELD DEFICIENCY - There is no defined general secondary containment for the oil transfer piping, vehicle fueling (fuel dispenser pump) area, and tank truck unloading area located immediately north of the bulk oil storage container "tank farm". The new pipe trench may eventually provide adequate containment in practice, but this feature has not been finished nor has it been discussed as an adequate solution in the plan."</i></p>
112.7(e) Inspections		X	<p>Inspections and tests conducted in accordance with written procedures. Record of inspections or tests signed by supervisor or inspector. Kept with Plan for at least 3 years.</p> <p><i>"FIELD DEFICIENCY - The facility manager has not kept records of monthly visual inspections of the facility as required by section 9.0 (Inspection and Records) of the SPCC plan."</i></p>
112.7(f) Training (1)-(3)	X	X	<p>Personnel, training, and oil discharge prevention procedures (1) Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan.</p> <p><i>"FIELD DEFICIENCY - Inspectors interviewed facility employee Ira Hodges. He stated that his job at the facility is to "do everything around here" which involves operating oil transport trucks, loading and unloading oil transport trucks into bulk storage containers, and maintaining equipment at the facility. He stated that he has no knowledge of SPCC rules, and that he had no idea if an SPCC plan existed or where it might be kept at the facility. The facility has no documentation that training of facility personnel, as required in Section 11.0 (Personnel, Training, and Spill Prevention Procedures) of the SPCC Plan, has occurred."</i></p> <p>(2) Person designated as accountable for discharge prevention at the facility and reports to facility management.</p> <p><i>"PLAN DEFICIENCY - The SPCC plan indicates that Pete McDaniel is responsible for discharge prevention at the facility. A new person has not been designated since the facility ownership changed in 2004 and Mr. McDaniel ceased to be associated with facility operations."</i></p> <p>(3) Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.</p>
112.7(g) Security		X	<p>Plan describes how to:</p> <ul style="list-style-type: none"> • Secure and control access to the oil handling, processing and

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			<p>storage areas;</p> <ul style="list-style-type: none"> Secure master flow and drain valves; Prevent unauthorized access to starter controls on oil pumps; Secure out-of-service and loading/unloading connections of oil pipelines; and Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges. <p><i>“FIELD DEFICIENCY - The facility has not completed security fence repairs and improvements that were required by Section 13.0 of the SPCC plan to prevent access by unauthorized persons to the oil handling areas of the facility. The facility also has not secured pipe caps and valve handles at the tank truck unloading area as required by Section 13.0.”</i></p>
112.7(h) Loading/Unloading Rack Containment (1)	X	X	<p>Loading/unloading rack drainage flows to catchment basin or treatment facility designed to handle discharges or uses a quick drainage system. Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility.</p> <p><i>“PLAN DEFICIENCY - The SPCC plan does specify adequate secondary containment at the truck loading rack; the plan should specify containment equal to or greater than the largest truck oil compartment.</i></p> <p><i>FIELD DEFICIENCY - The truck loading rack does not have secondary containment. The facility should provide containment sized for the largest tank truck compartment (2,600 gallons).”</i></p>
112.7(j) Discussion of Conformance	X	NA	<p>Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112.</p> <p><i>“PLAN DEFICIENCY - The SPCC plan does not discuss conformance with state or local regulations that may be more stringent.”</i></p>
112.8(b) Facility Drainage (3)&(4)	X	X	<p>Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas.</p> <p>If facility drainage not engineered as in (b)(3) (i.e., drainage flows into ponds, lagoons, or catchment basins) then the facility is equipped with a diversion system to retain oil in the facility in the event of an uncontrolled discharge.</p>
112.8(c) Bulk Storage Containers (2)	X	X	<p>Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation.</p> <p><i>“PLAN DEFICIENCY - The SPCC plan states that there must be sufficient freeboard for precipitation, but does not state what amount that is, nor does it provide containment capacity calculations.</i></p> <p><i>FIELD DEFICIENCY - Section 13.0 of the SPCC plan states that mud and debris (gravel) from the hillside have decreased containment capacity and that it must be removed to restore adequate containment capacity. It does not appear that the facility has adequately implemented this maintenance requirement. No documentation was found that this was completed, and the containment area still appears to be filled with debris. Additionally, there is no secondary containment provided for the heating oil container that is installed at the facility office”</i></p>
112.8(c) Integrity Testing (6)	X	X	<ul style="list-style-type: none"> Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing

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112.8(c) Liquid Level Sensing (8)	X	X	<p>Each container is equipped with at least one of the following for liquid level sensing:</p> <ul style="list-style-type: none"> • High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities; • High liquid level pump cutoff devices set to stop flow at a predetermined container content level; • Direct audible or code signal communication between container gauger and pumping station; • Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers; or • Regularly test liquid level sensing devices to ensure proper operation. <p><i>“PLAN DEFICIENCY - The SPCC plan does not address periodic testing of bulk oil storage container liquid level sensing gauges.</i></p> <p><i>FIELD DEFICIENCY - Trent Wright answered inspectors' questions regarding the bulk storage container liquid level gauging systems. He stated that many variables affect the operation of these gauges including operator "style", temperature, and pressure. He stated that the gauging system is based on the hydraulic pressure of the container contents which is compared to a reference level that the gauge has been calibrated to. He stated that the system can be up/down by up to 300 gallons per day (600 gallon error range). He stated that operator "style" introduced errors because different operators applied different rounding techniques to the analog gauge readings. He stated that he believed that the readings could be inaccurate by up to 6 inches per day (his estimate), which equates to hundreds of gallons of oil volume uncertainty per day. He provided daily container liquid level calculations to the inspectors, however, the data was incomplete and unorganized, and he could not demonstrate that the facility understood how much oil was actually in storage or being lost by leakage. He could not provide any documentation regarding gauge calibration or</i></p>

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			<i>maintenance and stated that he did not know 'when or if they had ever been calibrated'."</i>
112.8(c) Facility Housekeeping (10)		X	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. <i>"FIELD DEFICIENCY - The facility has failed to correct visible discharges of oil from the highway-diesel fuel container and the off-road diesel fuel container. Uncorrected visible discharges of oil were also observed from oil transfer piping (including associated valves, joints, etc.) between the bulk storage containers and the truck loading rack and the truck unloading area."</i>
112.8(c) Mobile or Portable Containers (11)	X	X	Mobile or portable containers positioned to prevent a discharge as described in §112.1(b). Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation. <i>"PLAN DEFICIENCY - The SPCC plan does not specify secondary containment for the portable containers (drums) in the warehouse. FIELD DEFICIENCY - Portable oil storage containers (drums) in the warehouse do not have secondary containment. The drums are stored on top of an elevated wood plank floor which has visible gaps between the planks. The warehouse exterior is finished with vertical wood planks which also have visible gaps. A spill of oil would flow through the floor onto the ground surface below the warehouse and could potentially flow laterally from under the warehouse and discharge off-site."</i>
112.8(d) Buried Piping (1)	X		Buried piping exposed for any reason is inspected for deterioration; corrosion damage is examined; and corrective action is taken. <i>"PLAN DEFICIENCY - Section 7.0 (Facility Transfer Pipelines and Operations) of the SPCC plan also does not address the requirement in 40 CFR 112.8(d)(1) to (if exposed for any reason) carefully inspect buried line for deterioration, and, if corrosion damage is found, undertake additional examination and corrective action as indicated by the magnitude of damage."</i>
112.8(d) Facility transfer operations, pumping and facility process (4)	X	X	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition. Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement.